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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

13 The BURNING MAN PROJECT, FRIENDS OF
14 BLACK ROCK/HIGH ROCK, INC., FRIENDS
OF NEVADA WILDERNESS, DAVID
JAMIESON, and ANDY MOORE, as individuals.

Plaintiffs.

V.

The UNITED STATES DEPARTMENT OF THE
1 INTERIOR, BUREAU OF LAND
2 MANAGEMENT, BLACK ROCK FIELD
3 OFFICE, MARK HALL, in his official capacity as
4 Field Manager of the Black Rock Field Office of
5 the Bureau of Land Management, and DEBRA
6 HAALAND in her official capacity as Secretary of
7 the Interior.

22 | Defendants.

Case No.: 3:23-cv-00013-LRH-CSD

**STIPULATION AND PROPOSED
ORDER TO EXTEND DEADLINES IN
JUNE 5, 2023 ORDER APPROVING
JOINT CASE MANAGEMENT
REPORT AND BRIEFING PLAN**

Plaintiffs and Defendants hereby stipulate and request the Court approve an extension of the deadlines, as set forth below, for the Production of the Administrative Record and Briefing on the Merits set forth in Paragraph 8 B through E of the Parties' Joint Case Management Report and Briefing Plan ("JCMR"). This is the first motion to extend time under the JCMR.

28 To that end, Plaintiffs and Defendants request that the deadlines within Paragraph 8 of the

1 JCMR be revised as follows:

2 B. Plaintiffs will notify Federal Defendants of any alleged deficiencies or other disputes
3 regarding the sufficiency of the administrative record by no later than **October 27, 2023**.

4 C. Federal Defendants will provide a response to Plaintiffs regarding any administrative record
5 issues by **November 17, 2023**.

6 D. If the parties are unable to resolve any issues related to the sufficiency of the administrative
7 record, the following briefing schedule will apply:

8 i. Plaintiffs' Motion to Supplement or Complete the Administrative Record: due by
9 **December 1, 2023**.
10 ii. Federal Defendants' Opposition: due by **December 15, 2023**.
11 iii. Plaintiffs' Reply: due by **January 5, 2023**.

12 E. Plaintiffs shall file their motion for summary judgment and brief in support of their motion
13 for summary judgment, the following schedule will apply:

14 i. Plaintiffs' Motion for Summary Judgment: due 60 days from the Court's ruling on
15 Plaintiffs' Motion to Supplement or Complete the Administrative Record or, if no
16 such motion is filed, by **December 15, 2023**.

17 DATED this 12th day of October, 2023.

18 Respectfully submitted,

19 KEMP JONES, LLP

20 /s/ Christopher W. Mixson

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1 *Attorneys for Defendants*

1 **IT IS SO ORDERED.**

1 DATED: _____

1 _____
1 UNITED STATES MAGISTRATE JUDGE